## UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

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Case 23-12825-MBK Doc 695 Filed 06/05/23 Entered 06/05/23 13:12:09 Desc Main Document Page 2 of 4

In re: LTL MANAGEMENT LLC,<sup>1</sup> Chapter 11

Debtor.

Case No.: 23-12825 (MBK)

Honorable Michael B. Kaplan

# SUPPLEMENTAL CERTIFICATION IN SUPPORT OF APPLICATION FOR RETENTION OF PROFESSIONAL, OTTERBOURG P.C., EFFECTIVE AS OF APRIL 14, 2023

- I, Melanie L. Cyganowski, being of full age, certify as follows:
- 1. I am seeking authorization on behalf of Otterbourg P.C. ("Otterbourg") to be retained as co-counsel to the Official Committee of Talc Claimants (the "Committee") for LTL Management LLC (the "Debtor") in the above-captioned case ("Case"), effective as of April 14, 2023, the date on which the Committee selected Otterbourg to serve as its co-counsel and the date on which Otterbourg commenced providing legal services to the Committee.
- 2. At the request of the United States Trustee (the "<u>U.S. Trustee</u>"), this supplemental certification (the "<u>Supplemental Cyganowski Certification</u>") is being submitted in further support of the Committee's application (the "<u>Application</u>") to retain Otterbourg as co-counsel in this Case.<sup>2</sup>
- 3. The following individuals are working on this matter, or are expected to work on this matter. To the extent additional individuals are later assigned, their rates will be consistent with the proposed arrangement for compensation detailed in the Cyganowski Certification.

The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

A certification in support of the Application was also filed on May 3, 2023 (the "Cyganowski Certification") [Dkt. No. 401].

Attorney	Rate Per Hour
Melanie L. Cyganowski, Member	\$1,620
Richard G. Haddad, Member	\$1,240
Adam C. Silverstein, Member	\$1,150
Jennifer S. Feeney, Member	\$1,015
James V. Drew, Member	\$1,015
David A. Castleman, Member	\$925
Pauline McTernan, Member	\$795
John Bougiamas, Associate	\$905
Robert C. Yan, Associate	\$770
Michael R. Maizel, Associate	\$525
Michael A. Pantzer, Associate	\$525
Daniel T. McCarthy, Associate	\$375
Roslyn M. Wu, Awaiting Admission	\$325
Paralegal	Rate Per Hour
Jessica K. Hildebrandt	\$380

- 4. As was done in the Debtor's first bankruptcy case, Committee counsel have adopted a protocol that provides for Committee counsel collecting all monthly fee statements and interim fee applications prepared by the Committee professionals and circulating the same to the Committee for its review and approval of the fees and expenses.
- 5. The following information is provided in response to paragraph D.1 of the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013 (the "U.S. Trustee Guidelines"):
  - a. Otterbourg will comply with the U.S. Trustee Guidelines in connection with this engagement and has not agreed to variations from standard customary billing arrangements.
  - b. None of the professionals included in this engagement vary their rate based on the geographic location of this Case.

Case 23-12825-MBK Doc 695 Filed 06/05/23 Entered 06/05/23 13:12:09 Desc Main Document Page 4 of 4

c. The Committee has reviewed and has approved Otterbourg's general budget and staffing plan for the period of April 14, 2023 through July 31, 2023.
 Updated budget and staffing plans will be provided to the Committee on a quarterly basis for review and approval by the Committee.

I certify under penalty of perjury that the above information is true.

Date: June 4, 2023 /s/ Melanie L. Cyganowski

Melanie L. Cyganowski